

Republican  
National  
Committee

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2015 DEC -7 PM 1: 57

OFFICE OF GENERAL  
COUNSEL

December 4, 2015

Daniel A. Petalas, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 6991

Re: Complaint against Roger A. Stone and SW Technologies, LLC t/a Advocacy Data

Dear Mr. Petalas:

This Complaint is filed with the Federal Election Commission (the "FEC" or "Commission") by the Republican National Committee ("Complainant"), against Roger A. Stone ("Roger Stone") and SW Technologies, LLC t/a Advocacy Data ("Advocacy Data") (collectively, "Respondents") pursuant to 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.4. Roger Stone is the founder and CEO of Advocacy Data, an email marketing and political data vendor that sells data on potential contributors to political clients, including federal campaigns, and to nonprofit organizations. Complainant asserts, based on information and belief as set forth below, that Respondents have violated the Federal Election Campaign Act of 1971, as amended by the Bipartisan Campaign Reform Act of 2002 (collectively, the "Act"), and FEC regulations by illegally selling contributor information obtained from Complainant's FEC filings for the purpose of soliciting contributions.

I. **Facts:**

Complainant is a national party committee registered with the FEC, and files monthly reports with the Commission disclosing the identities of contributors whose contribution(s) exceed \$200 per calendar year. These reports are publicly available on the FEC's website. To help detect when contributor information from Complainant's FEC reports has been copied and sold for the purpose of soliciting contributions or for other commercial purposes, Complainant includes several pseudonyms (fictitious names that do not represent actual contributors) and fictitious addresses in its FEC reports, as authorized by the Act. When an FEC report is copied and added to a commercial list, the pseudonyms become a part of the commercial list.

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In June 2015, the National Rifle Association (the "NRA") and Jeb 2016, Inc. ("Jeb 2016") sent direct mail solicitations to a number of pseudonyms listed in Complainant's reports with the FEC. Complainant exchanged emails with the mailing vendor who distributed the Jeb 2016 solicitations and determined that the solicitations were sent to a contributor list entitled "Republican Elite Donors" (the "List"). See Exhibit A. Complainant learned from the mailing vendor and through further investigation that the List was marketed by TMA Direct ("TMA"), a list brokerage firm. See Exhibits A-B. Complainant sent an email to a TMA representative and learned that TMA was the List broker only, and that the List was owned by Respondents. See Exhibit C.

On June 11, 2015, Complainant sent a letter to Roger Stone demanding that he immediately cease and desist from utilizing or selling the List until he removed from the List all contributor information obtained from Complainant's FEC reports. See Exhibit D. The following week, Complainant received a voicemail from Roger Stone stating that he was in receipt of Complainant's letter, that he had scrubbed the List of all contributor information that was obtained from Complainant's FEC reports, and that he would prevent any continued illicit use of Complainant's contributor information in connection with the List. This voicemail confirmed that Respondents own the List and that the List contains information from the RNC's FEC reports that Respondents then sold for the purposes of making solicitations.

Despite Roger Stone's assurances that he would remove Complainant's contributor information from the List, Complainant received direct mail solicitations sent by Jeb 2016 addressed to Complainant's pseudonyms on the following dates: 6/19/2015; 6/23/2015; 7/17/2015; 7/29/2015; and 8/8/2015. See Exhibit E. Complainant also received direct mail solicitations sent by Carson America, Inc. addressed to Complainant's pseudonyms on the following dates: 7/28/2015; 7/30/2015; and 7/31/2015. See Exhibit F. On September 3, 2015, Complainant confirmed with TMA that Jeb 2016, the NRA, and Carson America, Inc. all used the List to make the solicitations addressed to Complainant's pseudonyms. See Exhibit G.

## II. Legal Analysis

Respondents' use of Complainant's contributor information is a clear violation of federal election law. It is illegal to sell or use contributor information copied from a political committee's FEC report for the purpose of soliciting contributions or for any commercial purpose. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.15. These reports are publicly available. 52 U.S.C. § 30111(a)(4). To prevent the illegal use of contributors' names and addresses, the Act allows a political committee to include up to 10 pseudonyms in each report it files. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.3(e). When an individual or organization copies contributor information from a political committee's FEC reports and adds that contributor information to a new fundraising list, that new fundraising list will include both the political committee's actual contributors and the political committee's pseudonyms. When the new list is sold or leased, and the customer that purchased or leased the list uses the list to solicit contributions, the political committee will receive those solicitations that are addressed to its pseudonyms.

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As a national party committee, Complainant must file monthly reports with the Commission which include, among other items, the identities and addresses of contributors whose contribution(s) exceed \$200 per calendar year. 11 C.F.R. §§ 104.5; 104.3(a)(4). Complainant takes advantage of the statutory prophylaxis provided for by the Act and includes pseudonyms in its FEC reports. As indicated in Section I, Complainant received more than ten separate solicitations addressed to pseudonyms included in its FEC reports. Through communications with a mail vendor, campaigns, a list broker, and Roger Stone, Complainant determined that Respondents own and market the List containing Complainant's contributor information. Respondents hired TMA to sell the List containing Complainant's contributor information to campaigns and non-profit organizations for the purpose of soliciting contributions from the names on the List. Respondents' actions are exactly the type of behavior that 52 U.S.C. § 30111(a)(4) and 11 C.F.R. § 104.15 are aimed at preventing and punishing. See AO 1981-05 (noting that the "principal, if not sole purpose" of the prohibition in 52 U.S.C. § 438(a)(4) and 11 C.F.R. § 104.15 is "to protect individual contributors from having their names used for commercial purposes, or from inclusion on contributor lists that are used for commercial purposes.") (citing AO 1980-101; AO 1980-78; AO 1977-66).

### III. Conclusion

Based on the foregoing facts and analysis, Complainant asserts that Respondents violated the Act and Commission regulations. Complainant requests that the Commission levy civil penalties against Respondents in accordance with 52 U.S.C. § 30109(a)(5) and 11 C.F.R. § 111.24. Because Respondents violated the Act intentionally, knowingly, and willfully, the civil penalties should be 200% of the amount of money Respondents earned from leasing the portion of the List containing Complainant's contributor information. 52 U.S.C. § 30109(a)(5); 11 C.F.R. § 111.24(a)(2)(i).

Complainant also requests that the Commission immediately enjoin Respondents from developing, marketing, leasing, selling, or otherwise making commercial use of the List until Respondents remove all information from Complainant's FEC reports. For purposes of administrative convenience, Complainant consents to the Commission investigating the allegations contained in this Complaint concurrent with any investigation conducted in connection with the complaint filed by the National Republican Congressional Committee against Roger Stone and Advocacy Data.

The foregoing is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,



S. Cooper Hawley  
Associate Counsel  
Republican National Committee  
310 First Street, SE  
Washington, DC 20003

Sworn and subscribed to in Washington, D.C. by the said  
Stephen Cooper Hankins on December 4, 2015

[Signature]  
Notary Public



My commission expires: August 14, 2020



## **Cooper Hawley - Legal**

---

**From:** Jim Rowley - Finance  
**Sent:** Wednesday, September 23, 2015 4:17 PM  
**To:** Cooper Hawley - Legal  
**Subject:** FW: Elite Republican Donors

**From:** Stephen Patton [mailto:stephen@pmihq.com]  
**Sent:** Wednesday, August 12, 2015 12:28 PM  
**To:** Jim Rowley - Finance  
**Subject:** RE: Elite Republican Donors

Looks like they are using the same one we've been using. Got this back from the other vendor on the list they've used for Jeb:

Tony Murray and Associates manages this file.

---

Stephen Patton  
Vice-President  
Precision Marketing, Inc.  
Established 1989

) - direct  
704-943-0595 - fax

**From:** Jim Rowley - Finance [mailto:JRowley@gop.com]  
**Sent:** Wednesday, August 12, 2015 12:19 PM  
**To:** Stephen Patton  
**Subject:** RE: Elite Republican Donors

Okay. Great.

**From:** Stephen Patton [mailto:stephen@pmihq.com]  
**Sent:** Wednesday, August 12, 2015 12:18 PM  
**To:** Jim Rowley - Finance  
**Subject:** RE: Elite Republican Donors

Absolutely. I've actually already reached out to them, so I'll let you know what I find out just so you have that info.

---

Stephen Patton  
Vice-President  
Precision Marketing, Inc.  
Established 1989

) - direct  
704-943-0595 - fax

**From:** Jim Rowley - Finance [mailto:JRowley@gop.com]  
**Sent:** Wednesday, August 12, 2015 12:16 PM

**To:** Stephen Patton  
**Subject:** RE: Elite Republican Donors

no need ... that's very helpful.

Thanks again

**From:** Stephen Patton [mailto:stephen@pmihq.com]  
**Sent:** Wednesday, August 12, 2015 12:15 PM  
**To:** Jim Rowley - Finance  
**Subject:** RE: Elite Republican Donors

Hey Jim,

Yes, Republican Elite Donors is the one that we (Precision) has been mailing for Jeb.

We have another firm also doing mail for Jeb and so I'm checking with them to make sure it's the same list since I didn't oversee their orders. The 2 codes you asked me about were their packages. I'll get back to you as soon as I hear back.

---

Stephen Patton  
Vice-President  
Precision Marketing, Inc.  
Established 1989

) - direct  
704-943-0595 - fax

**From:** Jim Rowley - Finance [mailto:JRowley@gop.com]  
**Sent:** Wednesday, August 12, 2015 11:55 AM  
**To:** Stephen Patton  
**Subject:** FW: Elite Republican Donors  
**Importance:** High

Stephen,

Republican Elite Donors is the one being mailed by Jeb ... correct?

Thanks,

Jim

**From:** Unda L. Fisher [mailto:lindaf@preform.net]  
**Sent:** Wednesday, August 12, 2015 11:53 AM  
**To:** Jim Rowley - Finance  
**Subject:** RE: Elite Republican Donors  
**Importance:** High

Hi Jim,

There are three lists with similar names.

Republican Elite Donors is managed by TMA

Elite Republican Contributors is managed by Cavalier Direct.

\$100+ Elite Direct Mail Donors is managed by NOVA.

Is there anything we can check for you on these?

Thanks!

Linda

*Linda L. Fisher*  
**President**

919-362-7755

*Preferred*  
**COMMUNICATIONS**

**DMA\***  
Not to be used for direct mail

**From:** Jim Rowley - Finance [<mailto:JRowley@gop.com>]  
**Sent:** Wednesday, August 12, 2015 11:41 AM  
**To:** Linda L. Fisher  
**Subject:** Elite Republican Donors

Who handles the brokerage on this list?

Thanks



# Exhibit B

1804474-601101

## **Cooper Hawley - Legal**

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**From:** Jim Rowley - Finance  
**Sent:** Wednesday, June 03, 2015 2:14 PM  
**To:** Cooper Hawley - Legal  
**Subject:** FW: Great to catch up  
**Attachments:** Print Republican Elite Donors.htm

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Here is the data card on the RNC donor list being marketed by TMA

-----Original Message-----

**From:** Holly Ruble [mailto:[holly@pinnlistco.com](mailto:holly@pinnlistco.com)]  
**Sent:** Wednesday, June 03, 2015 2:04 PM  
**To:** Jim Rowley - Finance  
**Subject:** Great to catch up

Jim,

Please find the Republican Elite data card attached along with the contact information for TMA.

It was great to catch up and to hear that all is still the same in DC.  
There are many things that I miss about DC but the traffic is not one of them.

I'll stay in touch regarding the political session at CMU. I'll even treat you to lunch at Permanti Brother's a must see if in Pittsburgh.

Best,  
Holly

Holly L. Ruble  
President  
Pinnacle List Company  
2800 Shirlington Road, Suite 970  
Arlington, VA 22206  
703 379-4394 ext 1

This e-mail and any files transmitted with it are the property of Pinnacle List Company and are considered private, confidential and solely for the use of the intended recipient. In addition, Pinnacle List Company e-mails and files may contain material that is legally privileged, proprietary and/or subject to copyright protection, under federal or state law.

**PINNACLE**

A List Company

**REPUBLICAN ELITE DONORS**

THESE DONORS ARE SERIOUS ABOUT SUPPORTING THE  
REPUBLICAN PLATFORM, NOT ONLY WITH THEIR VOTES, BUT  
WITH THEIR LARGE CONTRIBUTIONS.

**SEGMENTS**

200,872 TOTAL UNIVERSE / UNIVERSE RATE \$95.00/M  
200,872 DONORS \$95.00/M

**ID NUMBERS**

MANAGER ID  
NEXTMARK ID 428075  
MIN ID 428075  
SRDS ID

MEDIA TYPE  
CONSUMER



SOURCE  
COMPILED LISTS, DIRECT RESPONSE

GEOGRAPHY  
USA

**OPT-IN****MAINTENANCE**

MARKET ENTRY 01/07/2015  
NEW TO MANAGER 12/16/2014  
COUNTS THROUGH 05/26/2015

**DATA CARD MAINTENANCE**

NEW TO SYSTEM 12/16/2014  
LAST UPDATE 05/26/2015  
NEXT UPDATE 08/24/2015  
UPDATE FREQUENCY UNKNOWN

**DESCRIPTION**

THIS FILE IS COMPRISED OF DONORS WITH DEEP POCKETS, THEY ALL HAVE GIVEN LARGE AMOUNTS TO  
CAMPAIGNS ACROSS AMERICA TO ADVANCE THE REPUBLICAN AGENDA. THEY REFLECT ALL OF THE ASPECTS  
OF THE REPUBLICAN PARTY AND WILL SUPPORT ANY CANDIDATE OR GROUP THAT SUPPORTS THEIR  
AGENDA, TIME AND TIME AGAIN.

**SELECTS**

GEO \$5.00/M  
GENDER \$5.00/M  
TM FEE \$25.00/M  
REGENCY \$10.00/M  
DOLLAR SELECT \$10.00/M

**AVERAGE INCOME  
VALUE**

not available

MINIMUM ORDER  
MINIMUM QUANTITY  
MINIMUM PRICE

5,000  
\$0.00

MANAGER  
TMA DIRECT

COMMISSIONS  
BROKER

Info not  
Available  
Info not  
Available

**AGENCY**

GENDER  
MALE  
FEMALE

%  
%

NET NAME ARRANGEMENTS  
NET NAME IS ALLOWED  
FLOOR  
MINIMUM QUANTITY  
RUN CHARGES

0%  
0

EXCHANGES  
EXCHANGE IS NOT ALLOWED

8/28/2015

Print Republican Elite Donors

REUSE  
PLEASE INQUIRE

CANCELLATION  
CHARGES

KEY CODING  
PLEASE INQUIRE

ADDRESSING  
EMAIL  
FTP

\$50.00/F  
\$50.00/F

SPECIAL INSTRUCTIONS

**CONTACTS**

CONTACT NAME

ROLE

EMAIL

PHONE

FAX

★ ANDRES REY

arey@imadirect.com

703-547-4848

★ PRIMARY CONTACT

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 **NextMark**  
www.nextmark.com

1-800-444-6267

## **Cooper Hawley - Legal**

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**From:** Andres Rey <arey@tmadirect.com>  
**Sent:** Tuesday, June 09, 2015 4:14 PM  
**To:** Cooper Hawley - Legal  
**Subject:** RE: Republican Elite Donors

Hi Cooper,

The list owner is Roger Stone, from Advocacy Data. His E-mail is [roger@advocacydata.com](mailto:roger@advocacydata.com).

Thank you,  
Andres Rey

**From:** Cooper Hawley - Legal [mailto:CHawley@gop.com]  
**Sent:** Tuesday, June 09, 2015 3:11 PM  
**To:** Andres Rey  
**Subject:** Republican Elite Donors

Dear Mr. Rey:

As I said over the phone earlier this afternoon, I am contacting your organization about a donor list you manage named "Republican Elite Donors." As I am sure you are aware, it is illegal to copy information from any report or statement filed with the FEC and then sell that information or use that information for the purpose of soliciting contributions or for any commercial purpose. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.15. In order to prevent individuals from stealing information from political committees' lists, the FEC allows political committees to "salt" each report it files using fictitious names. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.3(e). It appears that the Republican Elite Donors list you manage contains several of the Republican National Committee's "salt names."

If TMA Direct owns this list, please immediately remove from the list all donor information that was obtained from the Republican National Committee's filings. If you are simply a broker for another individual or entity that owns this list, please provide me with the owner's contact information.

The Republican National Committee takes seriously any unauthorized use of Committee resources, and I am sure you appreciate the need for the Republican National Committee to protect its donor list. Thank you for your anticipated cooperation and immediate attention to this matter. Please call me if you have any questions.

Sincerely,

Cooper Hawley

**S. Cooper Hawley**  
Associate Counsel  
Republican National Committee  
(202) 863-8638

# Exhibit D

11-02-2017



**Republican  
National  
Committee**

June 11, 2015

Roger A. Stone  
Advocacy Data  
1629 K Street, NW, Suite #300  
Washington, DC 20006

Dear Mr. Stone:

It has come to my attention that your business, SW Technologies, LLC t/a Advocacy Data ("Advocacy Data"), owns a contributor list named "Republican Elite Donors" that utilizes information obtained in violation of federal law from a Republican National Committee ("RNC") contributor list filed with the Federal Election Commission ("FEC"). As I am sure you are aware, it is illegal to copy information from any report or statement filed with the FEC, and then sell or use that information for the purpose of soliciting contributions or for any commercial purpose. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.15. In order to prevent individuals from stealing contributor information from political committees' reports, and to alert political committees when their contributor information has been illegally obtained, the FEC allows political committees to include fictitious names in their reports. 52 U.S.C. § 30111(a)(4); 11 C.F.R. § 104.3(e). The Republican Elite Donors list you own contains several of the RNC's fictitious names.

The RNC asks that Advocacy Data cease and desist from utilizing federally protected FEC contribution reports containing RNC contributor information, and from utilizing or selling the Republican Elite Donors list until Advocacy Data removes from that list all illegally obtained RNC contributor information. The RNC devotes considerable resources to ensuring that its contributor lists are not illegally obtained, distributed, or sold to unauthorized users. The RNC takes such violations very seriously and will pursue all available legal and administrative remedies as necessary to protect its interests.

Please acknowledge your receipt of this letter and respond by mail or phone at 202-863-8638 to outline the steps that Advocacy Data is taking to resolve the issues discussed in this letter, as well as the actions Advocacy Data will take to prevent future prohibited use of the RNC's contributor information. Thank you for your anticipated cooperation and immediate attention to this matter.

Sincerely,

S. Cooper Hawley  
Associate Counsel



16044476262



# Exhibit E

**Jeb Bush**  
Post Office Box 16399  
Tallahassee, FL 32317

**► Open immediately: your personal invitation is enclosed.**



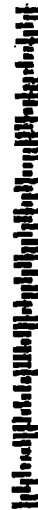
720

DATE: 06/23/15  
Operator: PAT  
Shipment: CHERYL 1  
US MONITOR  
BIN: S1-16  
KENTAL MAIL  
1 OF 2 24908204

**Sarasota, FL 34236-3426**

# Feb! 2016

**Observation**



# Jeb Bush

Sarasota, FL 34236-3426

Dear Octavia,

**Leadership.** That is what is sorely missing in the White House. And that is why I have decided to offer myself as a candidate for President of the United States.

after six months of listening to citizens across our nation, what I am hearing is universal frustration with the inability of this President to work with Congress and his open contempt for our Constitution and individual liberty.

But all of that can be fixed. I honestly believe our nation's best days are just around the corner. All we need is the right kind of conservative leadership in Washington, and we can again unleash the greatness that dwells within our citizens.

To make that happen, I offer a positive, conservative vision that I will take to every corner of America...including places where Republicans have rarely gone and where there is great opportunity for our nation and Party.

will you join me?

If so, I need your immediate help. Running a nationwide campaign with the resources to win is a major undertaking, and I need you to be one of the first to join my Florida Leadership for America Committee.

If your answer is "Yes," please sign and mail back to me the enclosed campaign membership acceptance. Please don't wait. The first election contest is less than 230 days away.

When you do, I hope you will include your most generous contribution of \$25, \$50, \$100, \$250, \$500, or even the maximum allowed by law of \$2,700. No matter what, I want to hear from you as soon as possible, so please respond today.

You and I must lead a thoughtful conservative reform movement that will ignite robust economic growth, lift the middle class, restore the American dream and rebuild our national defense.

Now, there are a whole lot of Republicans also talking about running for President. But, there is one major difference that separates me from the pack: proven experience.

*(over, please)*

Post Office Box 16399, Tallahassee, FL 32317

Paid for by Jeb 2016, Inc.

The truth is while others talk about cutting taxes and spending...I've done it.

As Governor of Florida for two terms, I cut over \$19 billion in taxes, vetoed more than \$2 billion in wasteful spending and reduced the state government workforce by more than 13,000 bureaucrats.

While others talk about creating jobs and prosperity...I did it!

My limited government approach helped unleash one of the most robust and dynamic economies in the nation, creating 1.3 million net new jobs — more than any other state except California, including Texas.

And some may talk a good game about improving schools for our kids...but when it comes to this subject, I can honestly say no one can compare to my record.

To save Florida's children from failing schools, I took on the powerful education unions, created the most ambitious school choice program in the nation and coupled that with a bold accountability system. As a result, Florida's children have made vast improvements in reading and math.

So, while I firmly believe education reform is up to the states, it is critical to our nation's future, and I will be a strong advocate for putting the needs of our kids first.

Perhaps the most challenging task our next President will face is rebuilding the respect of our allies and instilling fear in our enemies. Both have been lost under the failed policies of President Obama and his Secretary of State Hillary Clinton.

Unlike others in the race, I have vast experience on the world stage. I have made 90 trips to 32 countries on 6 continents including my most recent trip to Germany, Poland and Estonia where I met with several world leaders.

What I know for certain is that the rest of the world is thirsting for leadership from America. It is our manifest destiny, and the world is a safer place when we lead.

Finally, aside from my eight years as Governor of one of the largest and most diverse states, I am proud that I have not been in politics my whole life. Before I ever ran for Governor, I built a successful real estate business from scratch.

I understand how to build a business, create jobs and help real people achieve their free market dreams through their own hard work.

I believe in the greatness of America, and the genius of our Constitution and Bill of Rights, written by visionary leaders who unlocked the great potential of a free people.

*(next page, please)*

16044479266

# Membership Acceptance



## Florida Leadership for America Committee

From:

Sarasota, FL 34236-3426

To:

Jeb Bush

PJEB018 401865150



**Yes, Jeb!** I want to help you take your positive, conservative vision to every corner of America. I agree our nation's best days are ahead, but only if we reverse the left-wing policies imposed by this President.

Count me in as one of the first members of your presidential campaign leadership team. Enclosed is my special gift of:

☐ \$25 ☐ \$50 ☐ \$100 ☐ \$250 ☐ \$500 ☐ \$2,700 ☐ Other \$\_\_\_\_\_

Please make your check payable to: **Jeb 2016, Inc.**

To make your gift securely online, go to: [www.jeb2016.com/member](http://www.jeb2016.com/member)

*Please see reverse.*

As President, I will celebrate success and risk taking, protect liberty, cherish free enterprise, strengthen our national defense, embrace the energy revolution, fix our broken immigration system and help all children realize a better future.

If you agree that America needs a conservative leader with a proven track record in the White House — one who won't need on-the-job training — I humbly ask for your support.

can I count on you? I hope so.

Please join me today by becoming a founding member of my Florida Leadership for America Committee. Just sign and complete the enclosed reply and mail it back to me in the enclosed envelope.

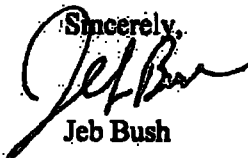
And when you do, please enclose your largest campaign victory gift. The maximum amount allowed by law is \$2,700, but even if sending \$500, \$250, \$100, \$50, or even \$25 is better right now, please don't wait. I am truly grateful for your support.

I make this promise to you: I will not cede one inch of territory to our liberal Democrat opponents — no issue, no demographic group, no voter.

There is an entire generation of conservatives in this nation just waiting for us to explain our beliefs, inspire and ask for their support. As the first Republican Governor ever re-elected in Florida history, I know how to build winning coalitions.

You and I must reverse the left-wing policies imposed on Americans by this President, unleash our economic engine and rebuild respect for our nation around the globe.

Please help me do so. Thanks and God bless you and yours.

Sincerely,  
  
Jeb Bush

P.S. You know me by my last name. And I'm proud of my family's service to our nation. But I am my own man. My adult life began when I was seventeen, and I met my beloved bride-to-be Columba. It was love at first sight, and over the past 41 years, we settled in Miami, built a business, raised a family, led a large state and now enjoy our four grandchildren. We are a modern American family — multi-cultural, devoted to our Christian faith, active in our community, business and politics.

My life is an open book. If you like what you see, I hope you will join me today.



## REQUIRED CONTRIBUTOR INFORMATION:

This contribution is made by check or credit card from my personal funds and is not drawn on an account maintained by an incorporated entity. I am a U.S. citizen or permanent resident and this contribution will not be reimbursed by another person.

Signature: \_\_\_\_\_

E-Mail: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ ☐ Check here to receive mobile alerts.

By law, the maximum amount an individual may contribute is \$2,700 (\$5,400 per couple) per election. Joint contributions require the signatures of both contributors. Federal multi-candidate PACs may contribute \$5,000 per election.

Contributions to Jeb 2016, Inc. are not tax deductible as charitable contributions for federal income tax purposes. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions aggregate in excess of \$200 per election cycle. Contributions from corporations, foreign nationals (non-green card holders), federal government contractors and minors under the age of 16 are prohibited.

Occupation: \_\_\_\_\_

Employer: \_\_\_\_\_

### To Contribute by Personal Credit Card, Please Complete the Following:

Type of Card: ☐ Visa ☐ MasterCard ☐ American Express ☐ Discover



Credit Card #: \_\_\_\_\_

Security Code: \_\_\_\_\_ Exp. Date: \_\_\_\_\_

Amount of Gift: \$ \_\_\_\_\_

Name on Card: \_\_\_\_\_

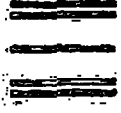
Signature: \_\_\_\_\_

Paid for by Jeb 2016, Inc.

10044710400

PRI-

Please place your first-class stamp here.  
Thank you!



JEB 2016, INC.  
PO BOX 16399  
TALLAHASSEE FL 32317-6399





**DATE: 07/17/15**

Operator: LAUREL  
Slyant: CHERYL 1  
IN MONITOR

BIN: S1-16

RENTAL MAIL  
2 oz. \*\*\* 24973930

**North Miami Beach, FL 33160-3703**

**Autop**

# THE UNIVERSITY OF CHICAGO

# Feb. 2016

**Jeb Bush**  
Post Office Box 16399  
Tallahassee, FL 32317

► **Open immediately: your personal invitation is enclosed.**



**DATE: 06/19/15**

Operator: CAROL

Shipment: CHERYL 1

US MONITOR

**BIN: S1-16**

RENTAL MAIL

2 oz. \*\*\* 24899677

**JUN 19 2015**

Grand Forks, ND 58203-2254

~~ID#~~ 968

**Jeb!**  
**2016**

AUTO



**Operator: CAROL**

**Shipment: 1751**

## US MONITOR

**BIN: 08-84**

**102. 25037223**

**Phoenix, AZ 85032-3422**



5

# **JeB Bush**

**Post Office Box 16399  
Tallahassee, FL 32317**

**► Open immediately: your personal invitation is enclosed.**

# Jeb! 2016

**Rigby, ID 83442-5594**

**ADP**

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151

**BIN: 08-84**

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**Exhibit F**

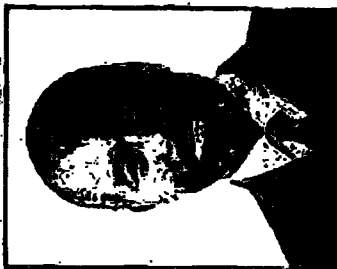
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# WELCOME

**பெரிய  
பெரிய**



100  
MAY 1968  
POSTMARK



**DR. BEN CARSON**

Marie!, I want you to have what's inside. /  
limited edition copy of my book, "My Life."

DATE: 07/28/16

**Operator: CAROL**

**Shipment: 1751**

# US MONITOR

**BIN: 08-84**

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**Wethersfield, CT 06109-1248**

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# BEN CARSON

## FOR PRESIDENT 2016



Dear

This is the single most important question I'll ever ask you:

**May I please have your support today as I launch my campaign to become President of the United States? I need it. I really do.**

*That's why I've enclosed this OFFICIAL pre-paid PRIORITY RETURN ENVELOPE. I didn't want anything to come between me and hearing back from you. I've authorized the extra expense for the postage because I absolutely need to hear back from you within 48 hours. Time really is of the essence.*

Let me say this to you right up-front – I can win this election. I feel it in my heart. And my head leads me to the same conclusion: I believe I am the only Republican candidate who can defeat Hillary Clinton, or whomever else the Democrats nominate.

**But first I want you to know that I wouldn't be running if it weren't for you. You are a blessing to my family and me. I could never thank you enough for the support you've given me. But that won't stop me from trying.**

And I am truly depending on you to help me successfully launch my campaign. So please, right now:

1. *Take* the 3 postcards I've sent you and mail them to three people. Spread the word!
2. *Display* the bumper sticker and window decal I've enclosed for you.
3. *Invest* as much as your heart will allow in this campaign – whether it's \$25, \$50, or even \$100.

When you do these 3 things, you will have planted the seeds for a truly historic undertaking – one that will put America and Americans right... with each other, with God, with our posterity.

Now let me share with you the reason why the numbers are in my favor – and in my favor only.

**The only way the Republican nominee will win the general election is if we**

(over, please)

1004747627  
7/26/14 4:00 PM

**energize the base to vote, and then we must attract Americans who have not voted for Republicans in recent elections.**

**How do we do that?**

**My plan for Americans is to give each one – regardless of circumstances, of color, of social standing – the opportunity to achieve the American Dream. And that doesn't happen when you rely on the government to take care of you.**

**How do I know?**

**I've lived it. I know what it takes to make the American Dream a reality.**

**I was a poor child from a fatherless home, as was my brother. I was angry, violent – a lousy student...**

**And in the minds of those on the Left my brother and I were victims... we weren't capable of overcoming our circumstances... they told us we would end-up dependent on the government, or in jail, or dead by the time we were 25.**

**My mother wouldn't hear of it. She was no victim. And neither were her sons. And she wouldn't let us be victimized by liberals who saw us as "less than."**

**And with work, with faith, with education I achieved... and I have lived a blessed and successful life.**

**This is the message I hope you'll help me bring to every community.**

**I know you feel just as I do: Our children and grandchildren deserve nothing less than the opportunities that you and I have had.**

**That's why your belief in me – in my candidacy means so much to me.**

**It seems others believe I can win, too:**

- **Fred Barnes, the highly regarded political commentator, wrote a piece on me in the *Weekly Standard*. In it he asked, "If nominated, can Carson beat Hillary Clinton or another Democrat?" And then answered: "Yes, he can."**
- **Mark Levin – the great talk radio host and beacon of the conservative movement –said that I would make a "superb President."**
- **And in Iowa, our first test, the state's party chairman told the *Journal*, "He probably has the edge right now."**

**Yes, what you and I can do together is truly historic.**

**Here's a recent headline I read:**

**"Ben Carson Will Win in a Landslide Because He Will Not Only Win Over**

**(next page, please)**

1004446278



Page Three

**Traditional Republican Voters, But Also African Americans and Hispanics."**

To do that, I have to make a strong showing in the early primaries. It's that simple. And for that to happen, my campaign needs your financial support.

Many people -- and most everyone in the media -- will measure my viability as a candidate based on the amount of money I raise. I get that. And they're right.

Yes, a 21<sup>st</sup> century campaign is expensive.

I don't come from the political class, and I don't have a team of lobbyists and insiders funding my team.

**My campaign is "of the people, by the people, and for the people."**

I will EARN every dollar I need for this campaign by working 14, 16, 18 hours every single day... traveling from town-to-town, from bakery-to-small farm, from school gyms-to-town halls... Listening to, learning from, and leading my fellow Americans.

Right now, my campaign is focused on four things:

**RECRUIT, REGISTER, ENERGIZE, MOBILIZE.**

When you contribute today, you'll help me build the biggest, hardest-working grassroots team in the business. Your dollars will help us acquire precision data-mining technology that will identify people inclined to vote for me.

We must add staff, trainers, volunteers. We need an infrastructure in place so we can make thousands of phone calls, knock on thousands of doors, distribute thousands of pieces of literature. Then we must get people to the polls... to vote.

And when you give today, you're investing in the TV advertising -- priced roughly at \$16 million -- that every campaign needs to win votes in the early primary states. That figure does not include Internet advertising, mail, phones and radio, bringing media costs up to \$20 million.

Yes, I need your help. And I need it right now.

Everything we're working towards depends on having the money to run a successful campaign.

Every single dollar you give is important. Every single one. I believe it.

You know what else I believe?

I believe in the American people. There's an awful arrogance in the government culture. They think they're smarter than the rest of us and so they act without humility,

(over, please)

10047476210

consideration, and an appreciation for our history. That's got to change. And it will when we elect a President who acknowledges, respects, and honors this country's greatest resource: Her people;

I believe personal taxes should be flat and fair. The IRS should ultimately be eliminated. And corporate taxes must be lowered.

I believe opportunity exists for anyone willing to work hard. I believe it. I know it. I've lived it. In America, anything IS possible.

I believe in peace through strength. I believe we must defeat our enemies before they become strong enough to destroy us. I believe we should seal our borders right away;

I believe in charity and private enterprise and school choice. We are a Judeo-Christian nation and I believe we need a spiritual awakening;

I believe in you,            I. In your power. In your courage.

*We live in a time and a place that calls for extraordinary courage, sacrifice, and fortitude.*

**Will you do something extraordinary today?**

**Will you stand-up for what and who you believe in?**

**Will you invest \$25 or \$50 in this campaign... in me... in our shared values?**

*I wouldn't have risked the extra cost for the OFFICIAL pre-paid Priority Envelope if I didn't have faith in you to answer my call.*

**So please don't let it go to waste. Please rush your critical \$25 contribution today. You and I – and millions who will join us – we will set America right.**

With deep thanks,

Ben

**P.S. This is it. I am running for President. I am doing it because of you and with you. And I've made my own investment in you by paying the extra postage for this official pre-paid Priority Return envelope. I didn't want anything to come between me and hearing back from you within the next 72 hours. I'm really counting on you to kick-off my campaign with your \$25 contribution. Will you also please display your bumper sticker and window decal, and mail the 3 postcards to friends? And always, always remember how much you mean to me and to my family. God bless you.**

# BEN CARSON

## FOR PRESIDENT 2016

Dear

You have inspired me to travel the country, town-by-town, and listen to the worries and the hopes of our fellow Americans.

Now you are part of something that is bigger than both of us – a groundswell movement to reclaim America's greatness, glory, and promise for our children and our grandchildren. You are a part of my campaign to become President of the United States. And I couldn't be more proud, more grateful, more humbled by your support.

Will you please invest \$25, \$50, \$100 in the true conservative ideals – family, faith, individual initiative, hard work, a solid education, private enterprise – that have made the United States the greatest nation on earth?

*I cannot do this without you. So I'm asking for your prayers as I run for the Presidency. Know that you are in mine. And remember – in America, ANYTHING is possible.*

*Ben*

### REPLY TO DR. BEN CARSON

Wethersfield, CT 06109-1248

701724900 CAP0716

- ☐ **YES BEN!** You and I believe in many of the same things: Personal accountability, hard work, opportunity, faith, a government FOR the people, low taxes, free-market healthcare, entrepreneurship, family... And you have the vision, the integrity, the strength, the pure patriotic heart that America needs to lead this nation back to greatness. I stand with you, Dr. Ben Carson! My prayers are with you and your family. May my investment lead you to the White House. Here is my contribution to your campaign:

☐ \$25    ☐ \$50    ☐ \$100    ☐ \$500    ☐ Other \$ \_\_\_\_\_

(Please make your check payable to: Carson America)

- ☐ I am using the official, pre-paid PRIORITY RETURN ENVELOPE to mail you my contribution to your campaign.
- ☐ Here is my email address. Please send updates on our campaign:
- \_\_\_\_\_

Signature of Contributor

Date

By signing this contribution form, I certify that, I have received this notice of the contribution compliance requirements of the Federal Election Campaign Act of 1971, as amended (FECA), and state the following: I am a citizen or permanent resident in the United States; The funds I am contributing are my personal funds and not those of another person. My contribution is not made from the general treasury funds of the following: a corporation, labor organization, national bank, a federal contractor, or corporation organized by Congress; If made by a personal credit or debit card, I certify that I have a personal legal obligation to pay for those expenses. I will not be reimbursed by any other person or entity for the contribution which I am making.

The Federal Election Campaign Act of 1971, as amended requires us to request that all persons making contribution in excess of \$200 per calendar year provide their name, address, occupation and employer. \* THE OTHER CONTACT INFORMATION IS NECESSARY FOR US TO REACH YOU.

Full Name

Your Spouse's Name AND Signature (Only if Joint Contribution)

Occupation

Employer

Spouse Occupation (Only if Joint Contribution)

Spouse Employer (Only if Joint Contribution)

Your Address

City

State

Zip Code

Home Phone

Mobile Phone

E-Mail

Type of Card: ☐ VISA ☐ MasterCard ☐ Discover ☐ AmEx

Card Number:

Amount: \$

Name on Card:

Exp. Date: /

Signature:

Contributions to Carson America, Inc. (CAI) are not tax deductible as charitable contributions for federal income tax purposes. An individual may contribute a maximum of \$2,700 to CAI for the primary election and an additional \$2,700 for the general election. Couples may contribute up to \$5,400 for each election. Contributions from a joint bank account require the signature of both persons. Federal multicandidate PACs may contribute up to \$5,000 for each election. By submitting your contribution, you agree that the first \$2,700 of your contribution is designated for the CAI 2016 primary election, and any additional amount up to \$2,700 will be designated for the CAI 2016 general election. Contributions from corporations, labor organizations, foreign nationals, national banks, corporations organized by Congress and federal government contractors are prohibited.

Paid for by Carson America, Inc.

**POSTAGE WILL BE PAID BY ADDRESSEE**

**CARSON AMERICA**  
**PO BOX 1023**  
**MERRIFIELD VA 22116-9676**

**NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES**

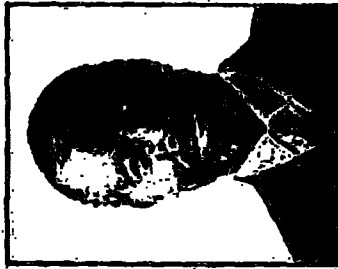
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## IMPORTANT INFORMATION INSIDE

# I'm with Ben

**BEN CARSON  
FOR PRESIDENT 2016**

P.O. BOX 1023, MERRIFIELD, VA 22116



DR. BEN CARSON

Carleton, I want you to have what's inside... AND a  
limited edition copy of my book, "My Life."

182

**DATE: 07/30/15**

**DALLAS, TX 75243-1403**

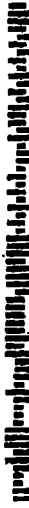
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US MONITOR

**BIN: 08-84**

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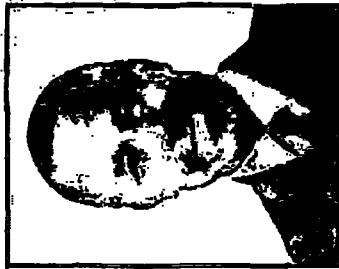


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**BEN CARSON  
FOR PRESIDENT 2016**

P.O. BOX 1023, MERRIFIELD, VA 22116



DR. BEN CARSON

Freda, I want you to have what's inside AND a  
limited edition copy of my book, "My Life."

708

Rigby, ID 83442-5594

DATE: 07/31/15

Operator: CAROL  
Shipment: 1751  
US MONITOR

BIN: 08-84

3 oz. 25013311

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AUTO





# Exhibit G

1004447-6287

## **Cooper Hawley - Legal**

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**From:** Jim Rowley - Finance  
**Sent:** Wednesday, September 23, 2015 4:12 PM  
**To:** Cooper Hawley - Legal  
**Subject:** FW: Republican Elite Donors

**From:** Greg Christman [mailto:gchristman@tmadirect.com]  
**Sent:** Thursday, September 03, 2015 3:01 PM  
**To:** Mike Murray; Jim Rowley - Finance  
**Cc:** Andres Rey  
**Subject:** RE: Republican Elite Donors

Hi Jim:

Yes, all three of these orders were processed by TMA list management.

**From:** Mike Murray  
**Sent:** Thursday, September 03, 2015 1:47 PM  
**To:** Jim Rowley - Finance <JRowley@gop.com>  
**Cc:** Andres Rey <arey@tmadirect.com>; Greg Christman <gchristman@tmadirect.com>  
**Subject:** RE: Republican Elite Donors

Hi Jim:

All well here and I hope the same with you.

Copying Greg & Andres from my office so they can confirm these usages on the Republican Elite list that was being managed by TMA Direct.

Thanks,  
Mike

**From:** Jim Rowley - Finance [mailto:JRowley@gop.com]  
**Sent:** Thursday, September 3, 2015 1:36 PM  
**To:** Mike Murray <mmurray@tmadirect.com>  
**Subject:** Republican Elite Donors

Mike,

I hope this finds you well.

Would it be possible for you to confirm that TMA brokered the list orders for Republican Elite donors (the Roger Stone/Advocacy Data list) to the NRA, Jeb Bush, and Ben Carson this year?

Our lawyer is requesting confirmation as part of a complaint about the origins of some of the records on the Republican Elite file.

Thank you,

Jim